

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK
BUFFALO DIVISION

Carlanda D. Meadors, an
individual, et al.,

Plaintiffs,

vs.

**Erie County Board of
Elections**, et al.,

Defendants,

and

India Walton, an individual,

Defendant-Intervenor.

Case No. 1:21—cv-982-JLS

**Declaration of
Bryan L. Sells**

1. My name is Bryan Sells. I am the attorney for the plaintiffs
in this case.

2. I have personal knowledge of the matters stated in this declaration. I am over the age of 18 years and am competent to make this declaration.

3. I submit this declaration in support of the plaintiffs' motion for an extension of time within which to file a motion for attorney's fees.

4. I contacted counsel for the defendants and for the defendant-intervenor by email this morning to determine whether their clients would consent to a 30-day extension of the deadline for filing a fee motion in this case.

5. Mr. Toth responded that his clients would consent.

6. Mr. Cooney responded by email asking whether the plaintiffs would be seeking fees against his client. I responded. After a few emails on that subject, Mr. Cooney did not indicate whether his client would consent or oppose this motion. As of the time of this filing, I have received no further response.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury
that the foregoing is true and correct. Executed on September 13, 2021.

/s/ Bryan L. Sells
Bryan L. Sells
Atlanta, Georgia